

DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY MATERIEL COMMAND
5001 EISENHOWER AVENUE, ALEXANDRIA, VA 22333-0001

AMC REGULATION
NO. 608-1

30 October 1992

Personal Affairs

CHILD DEVELOPMENT SERVICES INSPECTIONS, REPORTING
PROCEDURES AND DEPARTMENT OF DEFENSE CERTIFICATION
(RCS: GSGPA-1729)

Local supplementation of this regulation is prohibited.

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1. Purpose. This regulations describes the internal and external inspections of U.S. Army Materiel Command (AMC) Child Development Services (CDS) programs and the subsequent reporting requirement.

2. Scope. This regulation applies to all AMC CDS programs, including Child Development Centers (CDC), Family Child Care (FCC) programs, and Supplemental Programs and Services (SPS).

3. Explanation of terms.
 - a. Developmental Assessment Team Review (DATR). An annual internal inspection and evaluation process for all installation CDS programs.

 - b. External inspection. A comprehensive review of a program conducted by a source outside the installation staff.

 - c. Internal inspection. A comprehensive review of a program conducted by the installation staff.

d. Military Child Care Act (MCCA) of 1989. The legislation which requires four unannounced inspections per year of all military CDCs. One of the inspections must be conducted by major Army command (MACOM) staff. The other three inspections may be conducted at the local level.

4. MCCA DOD and DA requirements for inspections and certification of CDS programs.

a. Legislative inspection requirements are contained in the MCCA. The Department of Defense (DOD) requirements for inspections and certification are contained in paragraph 9a. The MCCA and DOD requirements are incorporated into Department of the Army (DA) requirements in paragraphs 9e, 9j and 9k.

b. Paragraph 9b requires installations to perform internal inspections of CDS programs through the DATR and record the findings on the DA Form 4841-R (Child Development Services (CDS) Program/Facility Report).

c. The MCCA requires military child care centers be inspected at least four times annually. Paragraph 9e clarifies that three of these inspections will be conducted by installation personnel and one by a MACOM/higher headquarters team.

d. Unannounced annual local comprehensive fire and safety inspection will be conducted per paragraph 9b, and verified by installation technical proponents on DA Form 4841-R. This requirement may be met through the completion of an annual inspection or any one of the monthly inspections. This inspection must be in addition to the DATR.

e. Unannounced annual local comprehensive health and sanitation inspections will be conducted in the same manner as described above.

f. Unannounced annual local multidisciplinary team will be conducted per paragraph 9b. Guidance for implementation of the DATR is at paragraph 5.

g. Unannounced annual MACOM team inspection will be conducted per paragraphs 9e, 9j and 9k. Description of the Headquarters (HQ) AMC MACOM Child Care Evaluation Team (MCCET) inspection process is at paragraph 6.

h. Paragraphs 9b, 9e, 9h delineate installations' reporting requirements for internal and external assessment and inspections.

i. The requirement in paragraph 9b for installations to submit DA Form 4841-R not later than (NLT) 45 days after the end of the reporting period is rescinded and replaced by the requirement to use the DA Form 4841-R to record deficiencies identified by the DATR. The DATR final

report, including the 4841-R is then forwarded to the AMC CDS inspection point of contact (POC) NLT 30 days following the completion of the DATR inspection. Tracking and reporting requirements for the DATR final report are in paragraph 7.

j. Paragraphs 9a, 9e and 9h state that following a MCCET inspection, installations have 90 days from receipt of the final inspection report to correct nonlife threatening deficiencies and report the corrections to AMC. Preliminary corrective action plans, and interim correction reports are also required. Specific guidance on submission of MCCET reports is applicable to all inspections conducted after 1 August 1991.

k. If an installation cannot accomplish specific corrections within the 90-day window, they may apply through AMC and Community and Family Support Center (CFSC) to Secretary of the Army for a waiver for those deficiencies. Waiver requests must be received at HQ AMC NLT 60 days after receipt of the final report at the installation. However, paragraph 9i states that waivers are not an acceptable means to delay repairs and requires that commanders personally certify that corrections are unsolvable at their level within the 90-day framework. Installations which are considering applying for waivers are instructed to contact the AMC CDS inspection POC for further guidance.

l. If an installation is unable to correct deficiencies and has not applied for or received a Secretary of the Army waiver by the 90-day deadline, the affected CDS program, section, or facility must be closed and the closure must be reported through channels to Congress. Clarification on this requirement is in paragraph 7.

m. Paragraph 9a requires that all military child development programs must be certified as meeting DOD standards. The MCCET inspection procedure includes this certification process. Explanation of the DOD certification process is at paragraph 8.

n. Both DOD and CFSC CDS will make periodic unannounced inspections of installation CDS programs to ensure compliance with standards and to verify the installation and the MACOM inspection process. Currently CFSC inspects one AMC installation per year and DOD inspects two Army installations per year.

o. Paragraph 9e states that all newly-constructed or renovated child care facilities must be inspected prior to occupancy by CDS programs. When they anticipate occupying a new or renovated facility, installations must request a preoccupancy inspection of that facility NLT 60 days prior to anticipated date of occupancy. AMC will convene a team of appropriate proponents to perform the inspection. During the inspection the team

will designate deficiencies which must be corrected prior to occupancy and deficiencies which may be corrected after occupancy but within specific timeframes.

5. Development Assessment Team Review. a. The CDS DATR is an on-going internal review process which allows the installations to self-assess and identify their program, fiscal and operational strengths and deficiencies. Evaluations and corrections are accomplished at the lowest management level, precluding higher headquarters intervention. Validation of DATR findings and corrections are the basis for MACOM inspections of installation CDS programs.

b. Requirements of the DATR are as follows:

(1) DATR must minimally be an annual review.

(2) DATR must be an unannounced review. If more than one DATR is conducted per year, only one must be unannounced. AR 608-10 (Child Development Services), paragraph 2-5b, requires the CDS Coordinator (CDSC) to organize and coordinate the review. At very small installations the CDSC is frequently dual-hatted as a program manager, or there may not be a CDSC. In these cases, the commander should assign the duties of organizing and coordinating the DATR to someone outside of CDS to ensure that the review is unannounced. The CDS staff can orient this outside person to the function and procedures of the DATR. Should the commander not elect to utilize an outside person for the DATR, and the DATR is not unannounced, then the commander must substitute another command-level unannounced inspection for the DATR.

(3) The composition of the DATR must follow the guidance in AR 608-10, paragraph 2-5b; however, installations may dual-hat team members. For example, if one of the CDC parents is also an employee of the Civilian Personnel Office (CPO), that parent may fill both roles.

(4) The DATR itself must include--

(a) Unannounced team inspection of all CDS facilities.

(b) Unannounced team inspection of 10 percent or minimally five provisionally certified homes and 10 percent or minimally five fully certified homes (all homes are randomly selected).

(c) Review of CDS management operations and policies.

(d) Review of developmental programming in all CDS programs.

(e) Review of evaluation data from the sources listed in AR 608-10, paragraphs 5-54c and 6-52c.

(5) The DATR final report should clearly identify program strengths and deficiencies, and must include a corrective action plan for all deficiencies. The corrective action plan must state how each deficiency is to be corrected, the installation POC, and the timeframe for corrections. Per AR 608-10, paragraph 5-53, center deficiencies must be corrected within 90 days of completion of the DATR.

(6) DA Form 4841-R must be used to document all deficiencies from the DATR.

(7) The developmental assessment team (DAT) must brief the Commander on their findings and recommendations.

(8) DATR records and reports must be kept on file at the installation.

(9) Findings and corrective action plans must be submitted to HQ AMC CDS within 30 days of completion of the DATR.

(10) CDS Coordinator or other CDS staff must track the corrective action plan to ensure corrections are accomplished. Updated correction reports must be submitted to AMC CDS inspection POC at 30-day intervals throughout the 10-day correction period in the same manner that MCCET inspection reports are forwarded.

c. Following are some suggested procedures for DATR implementation:

(1) Commander assigns team members to DAT.

(2) DAT members are oriented to CDS, developmental programming, and the DAT procedure. This is an excellent time to use materials such as the environment rating scales, National Association for Education of Young Children (NAEYC) publications, and Army videos. The team should be exposed to quality child care and the initiatives (Child Development Associate, accreditation, individual education plans (IEP), Child Abuse Risk Assessment Tool (CARAT)) that Army CDS uses to obtain and maintain quality programs.

(3) The team determines what procedures or instruments they will use to assess the CDS programs. Mandatory evaluation data is listed in AR 608-10, paragraphs 5-54c and 6-52c, but the team may choose to use additional information such as previous DATR reports, from MCCET or Army Child Care Evaluation Team (ACCET) inspections, or they may choose to perform their own evaluations using surveys or environmental rating

scales. Inspections in both CDC activity rooms and FCC homes should include some observation time of the interaction between children and caregivers or providers. Such observation may require that one team member return to the room/home for a subsequent visit when the full DAT team has not disrupted normal interaction.

(4) The DAT performs unannounced team inspections of all CDS programs, meeting the requirements for the number of FCC homes inspected.

(5) The DAT convenes to review all information they have gathered and to develop list of CDS program strengths and deficiencies. The deficiencies are listed on DA Form 4841-R.

(6) Using the DA Form 4841-R or similar format, the DAT develops a corrective action plan which includes--

(a) Description of the deficiency, including the reference to AR 608-10 or the Single Source Criteria.

(b) Steps to be taken to correct the deficiency.

(c) POC for correction. Note: This POC should not always be the CDS Coordinator or a CDS staff member. If the deficiency, for example, is a facility problem, the POC should be the appropriate person in the Directorate of Engineering and Housing (DEH) or facility office.

(d) Timeline for correction per AR 608-10, paragraph 5-53, which states that all center deficiencies must be corrected within 90 days of the date of the inspection.

(7) The DAT prepares final report for commander which includes program strengths and deficiencies, and the Corrective Action Plan (CAP). Commander approves CAP.

(8) CDS Coordinator submits copy of CAP to HQ AMC CDS program inspector within 30 days of completion of DATR.

(9) CDS Coordinator tracks corrections. At 30-day intervals throughout the 90-day correction period, command submits updated corrected action reports to AMC CDS program inspector.

(10) When other inspections are completed (i.e., MCCET, ACCET, DOD, preoccupancy), the findings from both the DATR and the other inspections are combined into one CAP and submitted to AMC as one report.

(11) DATR report is retained in local CDS files for access during higher headquarters inspections.

(12) The DATR reconvenes at a minimum, annually, or more frequently as the installation determines. The team can be organized to be an on-going group which provides the commander with a constant finger on the pulse of the CDS programs for that installation.

d. When used effectively the DATR process can be very beneficial to CDS programs in several ways. Team members learn more about CDS and begin to develop ownership for the program and their responsibilities toward the program. DAT members unfamiliar with CDS are generally very impressed with the level of dedication of the hard-working CDS staff and FCC providers. Commanders can learn a great deal more about the program and its benefits to the soldiers and civilians at his/her installation, and finds it easier to decide how to allocate resources. Once the commander has approved the CAP, the CDS coordinator has the authority needed to ensure that corrections are made in a timely manner, even when the corrections are the responsibility of another proponent agency such as fire or health.

6. MACOM Child Care Evaluation Team (MCCET) Process. a. The HQ AMC MCCET consists of the following multidisciplinary team members:

- (1) Team chief (may be dual-hatted with other team members).
- (2) Child Development Center (CDC) Program Specialist.
- (3) Family Child Care (FCC)/Supplemental Programs and Services (SPS) Program Specialist.
- (4) Architect/Facility engineer specialist.
- (5) Fire prevention specialist.
- (6) Safety specialist.
- (7) Health, sanitation, food and nutrition specialist.
- (8) Resource management specialist.

b. The MCCET inspects all AMC CDS programs annually. All inspections are unannounced.

c. The MCCET validates findings, recommendations, and corrective actions from the installation DATR as well as assessing installation CDS programs for compliance with DOD and DA standards for CDS programs.

d. The MCCET also reviews Youth Services programs and makes advisory comments on those programs and facilities.

e. The MCCET inspection identifies two types of deficiencies:

(1) Nonlife-threatening deficiencies - either detract from efficient operations or contribute to the lack of a safe, healthy and developmentally appropriate environment for children, but are not life threatening except when combined with other deficiencies.

(2) Life-threatening deficiencies - deficiencies with imminent danger which by themselves threaten the safety and well-being of the children.

f. Inspections will be accomplished using either full or partial teams based on installation size, composition, previous inspections results, or changes in management, programs, or facilities. Installations will receive a full-team inspection a minimum of every 2 years.

g. The installation inspection process usually follows this schedule:

(1) Day one:

(a) The team arrives at installation and contacts the commander to schedule an in-brief that includes the CDS staff, the installation proponent agency representatives, and whomever else the commander wishes to attend.

(b) At the in-brief the team chief introduces the team members, gives the background rationale for the inspection, and explains the inspection procedures. The chief also tells the commander if the team requires any special support during the inspection and asks if the commander has any special areas that he/she wishes the team to review. Finally, a tentative time for the out-brief may be established.

(c) At the in-brief, the CDS Coordinator or command representative may present an overview of the installation or the CDS program.

(d) After the in-brief the entire team tours CDCs.

(2) Days two and three:

(a) The team splits up and begins the inspection process. Using the DA Form 4841-R and the Single Source Criteria, the team inspects the facilities, performs fire drills, reviews files, records and standing operating procedures (SOP), observes child activity rooms and FCC homes, interviews management and caregiving staff, interviews parents, and meets with the functional area counterparts.

(b) As the team discovers deficiencies, they discuss them with the proponent agencies. Recommendations for corrective actions are discussed and staff assistance provided, as required.

(c) If any life-threatening deficiencies are discovered, the team chief is notified immediately. The team chief notifies the CDS coordinator, the Directorate of Personnel and Community Activities (DPCA), and the commander of the problem and the deadline to correct the deficiency (generally 48 hours or prior to the team leaving the installation).

(d) The team visits generally four to five FCC homes.

(e) At the end of each day the team meets to compare evaluations and resolve interproponency issues.

(3) Day four:

(a) The team completes the inspection and compiles commendations, advisories (those items that the team suggests the command correct), and deficiencies (those items the installation must correct). The team prepares handwritten finding sheets.

(4) Day four or five:

(a) The team chief and any other required team members meet with the commander and possibly the DPCA for a pre-outbrief. At this time, an overview and other subjects appropriate for private discussion are presented to the commander.

(b) Usually present at the outbrief are the commander, the command staff, including the CDS Coordinator, CDS program managers, and proponent agency representatives. The commander receives a copy of the handwritten finding sheets. Each team member gives a brief overview of the commendables, advisories, and deficiencies in their respective functional areas.

h. The subsequent inspection schedule will be basically the same as the baseline, however, the purpose of the inspection will vary slightly.

(1) The team will primarily ensure that deficiencies identified at prior inspections have been corrected. These deficiencies may have been identified through the MCCET process, other higher headquarters inspections, or at the installation level through the DATR process.

(2) If there have been program or management changes, the team will perform a baseline inspection on those areas. If any nonlife-threatening deficiencies are found, the installation will have the usual 90 days to correct those deficiencies.

(3) They will also identify nonlife-threatening deficiencies which have developed since the previous inspection. The installations will have the usual 90 days to correct those deficiencies, too.

(4) If any new life-threatening deficiencies are surfaced, the installation must correct these immediately. The team chief will inform the command of the timeline to accomplish corrections.

(5) As with the baseline inspection, the team will assist the installation in developing possible corrective actions and will be available for clarification of findings or recommended corrections.

(6) If the team finds that the installation has not corrected previously identified deficiencies, the relevant team members will determine appropriate action. Such action may include requiring the fixes be made before the team leaves the installation, requiring the fixes be made in a specific timeframe, allowing the installation the usual 90 days to correct the repeat deficiency, reporting the situation to appropriate Inspector General Command, or closing part or all of the program. Determination for action is based on classification of the deficiency, i.e., if it is minor, major, or life-threatening.

7. MACOM Child Care Evaluation Team installation reporting requirements.

a. In order to ensure correction of reported deficiencies and to facilitate tracking of deficiencies, the following reporting requirements are established for any installation MCCET inspection completed after 1 August 1991.

(1) Handwritten finding sheets will be left at the installation at the completion of the MCCET inspection. Installations should begin corrective action immediately after the inspection using these sheets. The information in the final report will not vary from the handwritten sheets; only grammatical or spelling errors will be corrected. The final report will consist of a cover letter, the finding sheets, including commendations, deficiencies and advisories, and a preliminary corrective action plan form which has been tailored to that specific installation. Copies of the finding sheets are to be used for the interim and final report back to AMC. They include a space for the installation to describe the corrective actions they have taken and the date the correction was accomplished.

(2) Installations must receive the final report NLT 45 days following completion of the inspection. The final report will normally leave HQ AMC within 3 weeks after completion of the inspection. Major subordinate commands (MSC) must ensure that the report is received at the installation commander level within the 45-day timeframe. For tracking purposes the MSCs are requested to notify the AMC CDS inspection POC when

the report leaves the MSC for the installation, and installation commanders are requested to notify AMC CDS inspection POC when the report is received at the installation.

(3) Once notified that the installation has received the final report, the AMC CDS inspection POC will verify the deadlines for submission of the preliminary Corrective Action Plan (CAP) within 30 days of receipt of report at installation), submission of the interim CAP report (within 60 days of receipt of report), and the final CAP report (within 90 days of receipt of report).

(4) The preliminary CAP for the installation is a simple fill-in-the-blank report designed to facilitate the installation response to AMC. The installation may make any relevant comments in the space provided.

(5) For the interim CAP report, installations should use copies of the finding sheets from the final inspection report and annotate which deficiencies have been corrected by indicating how they were corrected and the date they were corrected. The installation must cross-reference this interim report with the preliminary CAP to ensure that corrections were accomplished by the dates established or add a statement as to why they were not accomplished. Documentation of corrections should be submitted with the interim report. Statements that work orders or purchase requests have been submitted are not considered as accomplishing a corrective action. Corrections are accomplished when work is completed or equipment/supplies are received. Acceptable documentation includes copies of SOPs, developmental program plans, photographs, or other verification. This documentation will assist the AMC CDS staff in ascertaining if corrections were accomplished appropriately and help eliminate the need to contact the installation for clarification.

(6) The final CAP report is accomplished in the same manner as the interim report, annotating on the finding form and with accompanying documentation.

b. By the end of the 90-day window, deficiencies must have been corrected, a waiver applied for (within the proper timeframe) or a waiver received. If a deficiency is not corrected or waived as of the 90-day deadline, the facility, program or affected room/sections must be closed until the violation is remedied.

c. If an Army child development center or program is closed, the installation commander must notify and initiate a report through the Deputy Assistant Secretary of the Army (Manpower and Personnel) to the committees on Armed Services of the Senate and House of Representatives. The report must include a notice of the violation that resulted in the

closing, the cost of remedying the violation, and a statement of the reasons why the violation has not been remedied at the time of the report. A copy of this report must be provided to Assistant Secretary of Defense (Force Management and Personnel) (ASD (FM&P)).

d. When an MCCET inspection occurs at the same time that an installation is reporting to HQ AMC DATR corrections, or preoccupancy inspection corrections, the installation may combine all the monthly reports into one report for submission.

e. Following is a summary of the MCCET inspection reporting timeframes:

- (1) Outbrief at completion of inspection:
 - Handwritten finding sheets left with commander.
 - Installation begins corrections.
- (2) NLT 3 weeks after inspection:
 - Final report leaves AMC DCSPER.
- (3) NLT 45 days following inspection:
 - MSC ensures that installation receives report.
 - MSC notifies AMC CDS when report leaves MSC.
 - Installation notifies AMC CDS that they have received report.
 - AMC CDS inspection POC sets deadlines for reporting requirements based on date installation receives report.
- (4) NLT 30 days after receipt of report at installation:
 - Installation submits completed preliminary CAP.
 - MSC ensures that AMC CDS receives preliminary CAP.
- (5) NLT 60 days after receipt of report at installation:
 - Installation submits completed interim CAP report with documentation.
 - MSC ensures that AMC CDS receives interim report.
 - If applicable, installation request for waiver for specific deficiencies is received at HQ AMC CDS.

(6) NLT 90 days after receipt of report at installation:

- Installation submits final CAP annotating completion with documentation.
- MSC ensures that AMC CDS receives final report.

(7) 90 days after receipt of report at installation:

- All corrections accomplished OR
- waiver applied for/received OR
- facility/program/section closed.

8. DOD Child Development Program Certification. a. The DOD developed minimum standards for all military child development programs. When an installation CDS program meets standards they are recommended for DOD certification.

b. CFSC CDS has established three levels of certification depending on number and classification of deficiencies.

- (1) Conditional certification.
- (2) Full certification.
- (3) Full certification with commendation.

c. The MCCET team members cross-reference deficiencies from the DA Form 4841-R to the DOD Child Development Program Certification Checklist.

d. On a quarterly basis, AMC CDS submits to CFSC, a DOD Child Development Certification Report for each AMC installation which is not yet certified. AMC either recommends installations for certification or states the status of corrective actions.

e. CFSC reviews all recommendations and forwards them to DOD who will then approve certification. Certification is valid for 2 years.

f. If a subsequent inspection reveals that a previously certified program has fallen out of compliance with DOD standards, notification must be made to the Assistant Secretary of Defense (Force Management and Personnel) within 90 days accompanied by a CAP to bring the program back into compliance.

g. DOD will periodically (approximately twice annually) perform unannounced inspections at installations of their choice to review compliance with DOD standards.

AMC-R 608-1

9. References. a. DOD Instruction, Number 6060.2, 3 Mar 89, Child Development Programs (NOTAL).
- b. AR 608-10, 12 Feb 90, Child Development Services.
- c. Message, HQ AMC, AMCPE-AC-C, 271501Z Aug 90, subject: Military Child Care Act (MCCA) Unannounced Inspections.
- d. Message, HQ AMC, AMCPE-AC-C, 051230Z Sep 90, SAB.
- e. Memorandum, CFSC-FSC, 24 Jan 91, subject: Inspection and Department of Defense (DOD) Certification for Child Development Services (CDS) (NOTAL).
- f. Message, CFSC-FSC, 121600Z Apr 91, subject: Clarification of Discrepancies Between DOD Child Development Program Inspection and Certification Requirements and AR 608-10.
- g. Message, CFSC-FSC, 081600Z May 91, subject: Installations Child Development Services (CDS) Corrective Plan Update.
- h. Message, HQ AMC, AMCPE-AC-C, 131820Z May 92, subject: Submission of Correction Reports From Child Development Services Unannounced Inspections.
- i. Message, HQDA, DAPE-MBB-P, 232300Z Apr 91, subject: Child Care Facility Deficiencies.
- j. Memorandum, CFSC-FSC, 9 Mar 92, subject: Department of Defense (DOD) Certification of Child Development Programs (NOTAL).
- k. Memorandum, CFSC-FSC, 12 Aug 92, subject: Supplemental Guidance for Department of Defense (DOD) Certification of Child Development Programs (NOTAL).

The proponent of this regulation is the United States Army Materiel Command. Users are invited to send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) to the Commander, HQ AMC, ATTN: AMCPE-FC, 5001 Eisenhower Avenue, Alexandria, VA 22333-0001.

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